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July 2, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Pamela K. Chen, U.S.D.J.
225 Cadman Plaza East
Courtroom 4F North
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, et al.
Case No.: 1:22-cv-1032 (PKC) (JRC)
MLLG File No.: 25-2022

Dear Judge Chen:

This office, along with Sage Legal LLC, represents the Plaintiff IME WatchDog, Inc. (“Plaintiff”) in the above-referenced case.

In the Court’s July 1, 2024 Order, it directed the parties, Eugene Liddie (“Liddie”), and IME Legal Reps (“IMELR”) to inform the Court if they consent to combining the July 29, 2024 show cause hearing with the August 5, 2024 contempt hearing and as to whether Liddie and IMELR consent to extending the terms of the July 1, 2024 temporary restraining Order until August 5, 2024.

Mr. Felsen is not available on August 5, 2024 for the contempt hearing as he has a mediation in another matter and thus respectfully Plaintiff requests that the contempt hearing be conducted on July 29, 2024 after the show cause hearing. I have conferred with Defendants’ counsel and counsel for Liddie and IMELR consent to this request.

If it is not possible to conduct the contempt hearing on July 29 after the show cause hearing, then Plaintiff respectfully requests that the July 29, 2024 show cause hearing proceed as scheduled and that the August 5, 2024 contempt hearing be rescheduled for August 1 or 9. I have conferred with Defendants’ counsel who, along with their clients, are available on August 1 and 9 for the contempt hearing in the event that it cannot be heard on July 29 after the show cause hearing.

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen, Esq.

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

cc: All Counsel of Record (via ECF)